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Attorneys for Defendants MineOne Wyoming Data Center, LLC, MineOne Partners LLC, and Terra Crypto Inc.

# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

BCB CHEYENNE LLC d/b/a BISON BLOCKCHAIN,	)
a Wyoming limited liability company,	)
Plaintiff,	)
	) Civil Action No. 23CV-79-ABJ
v.	)
	)
MINEONE WYOMING DATA CENTER LLC, a	)
Delaware limited liability company; MINEONE	)
PARTNERS LLC, a Delaware limited liability company;	)
TERRA CRYPTO INC., a Delaware corporation;	)
BIT ORIGIN, LTD, a Cayman Island Company;	)
SONICHASH LLC, a Delaware limited liability company;	)
BITMAIN TECHNOLOGIES HOLDING COMPANY, a	)
Cayman Island Company; BITMAIN TECHNOLOGIES	)
GEORGIA LIMITED, a Georgia corporation; and JOHN	)
DOES 1-18, related persons and companies who control or	)
direct some or all of the named Defendants.	)
Defendants	)

DEFENDANTS MINEONE WYOMING DATA CENTER LLC, MINEONE PARTNERS LLC, AND TERRA CRYPTO INC.'S HEARING WITNESS & EXHIBIT LISTS

Pursuant to the Court's June 13, 2024 Order (ECF No. 217) directing the parties to exchange and file anticipated witness list and exhibits list, Defendants MineOne Wyoming Data Center LLC ("MineOne"), MineOne Partners LLC and Terra Crypto Inc. (collectively, the "MineOne Defendants") identify the individuals listed below to testify as witnesses and the documents listed below as potential exhibits for the hearing on Plaintiff's Amended Emergency Motion for Prejudgment Writs of Attachment and Garnishment (ECF No. 203). The MineOne Defendants respectfully submit the following list of individuals whom they will or may call to testify at the hearing, via such means as appear below. This list is advisory only and not a commitment that the MineOne Defendants will call all or any particular witness at the hearing. This list is not set forth in the order in which such witnesses are expected to testify.

The MineOne Defendants reserve the right to make an application to the Court to call additional witnesses in addition to those listed below. The list below does not include rebuttal and/or witnesses for credibility purposes. The MineOne Defendants reserve the right to call any witnesses called by the other parties and to revise this list in light of further rulings that may be issued by the Court or as a result of any other changed circumstances.

#### Witness Name and Means of Testimony

Mark Aldrich – via Zoom

Michael Murphy – via Zoom

Sean Murphy – via Zoom (pending service of or acceptance of subpoena by Mr. Patrick Murphy)
Emory Patterson IV – via Zoom (pending service of or acceptance of subpoena by Mr. Patrick Murphy)

Neil Phippen – via Zoom (pending service of or acceptance of subpoena by Mr. Patrick Murphy)

Steven Randall – via Zoom (pending service of or acceptance of subpoena by Mr. Patrick Murphy)

Dr. Erick Rengifo – via Zoom

This below exhibit list does not include any documents intended to be introduced solely for impeachment purposes, and the MineOne Defendants reserve the right to introduce such documents as exhibits for that purpose. The MineOne Defendants further reserve the right to introduce any exhibits they may deem necessary to introduce in fairness to rebut the other parties' witnesses' testimony and exhibits presented at hearing, to introduce any exhibits contained on the other parties' exhibit lists, and to revise this list in light of further rulings that may be issued by the Court or as a result of any other changed circumstances.

Defendants' Hearing Ex.	Exhibit Description	Bates No. / Other Designation
1	MineOne Defendants' Amended Corporate Disclosure Statement	ECF No. 41
2	Development, Hosting & Services Agreement between MineOne Wyoming Data Center LLC and BCB Cheyenne LLC, dated June 9, 2022	BCB 000068-90
3	Consultancy Services Agreement between BCB Cheyenne LLC and Terra Crypto Inc., dated June 9, 2022	BCB 000093-99
4	Email from Michael Murphy to Erick Rengifo and Jiaming Li, dated April 23, 2022	MINEONE0025201
5	Compilation of BCB Invoices	BCB 003341-79
6	Email from Michael Murphy to Iris Li and Jiaming Li, dated March 11, 2023	MINEONE0005568
7	Email from Jiaming Li to Michael Murphy, dated March 13, 2023	MINEONE0017531
8	Phase I Budget (as produced to BCB)	MINEONE0033209
9	Operation and Maintenance Service Framework Agreement between Bitmain Technologies Georgia Limited and MineOne Wyoming Data Center LLC, dated March 10, 2023	BITMAIN_GEORGIA_000038- 74
10	Email from Betsey Hale (Cheyenne Leads) to Michael Murphy enclosing Microsoft CIFUS Submission, dated November 7, 2022	BCB 000253-69

Defendants' Hearing Ex.	Exhibit Description	Bates No. / Other Designation
11	Presidential Order dated May 13, 2024	MINEONE0033218-28
12	CleanSpark Form 8K dated May 29, 2024	MINEONE0033229-
13	Email from Stephen Cohen to CleanSpark enclosing PSA Disclosure Schedules	MINEONE0033033
14	Blockchain Interruptible Electric Service Agreement between Cheyenne LLC and Cheyenne Light, Fuel and Power Company, dated February 22, 2022	MINEONE0033144-63
15	Blockchain Interruptible Electric Service Agreement between Cheyenne Light, Fuel and Power Company and MineOne Wyoming Data Center LLC, dated June 9, 2022	MINEONE0033187-208
16	Amended and Restated Blockchain Interruptible Service Agreement between Cheyenne Light, Fuel and Power Company and MineOne Wyoming Data Center LLC, dated April 1, 2022	MINEONE0033164-86
17	Loan and Security Agreement between AntAlpha and MineOne Wyoming Data Center LLC, dated July 27, 2023	MINEONE0033295-401
18	AntAlpha UCC Search	MINEONE0033402-07
19	AntAlpha Payoff Statement dated June 6, 2024	MINEONE0033291-94
20	Terra Crypto, Inc. Promissory Note dated September 14, 2022	MINEONE0033440-47
21	Purchase Agreement between Terra Crypto, Inc. and MineOne Wyoming Data Center LLC, dated September 16, 2022	MINEONE00334420-32
22	Terra Crypto, Inc. Promissory Note dated December 20, 2022	MINEONE0033448-55
23	Repurchase and Debt Conversion Agreement between Terra Crypto, Inc. and MineOne Wyoming Data Center LLC, dated March 20, 2024	MINEONE0033433-39
24	Loan Agreement between Yu & Jing Investment LLC, Oriental Sun	MINEONE0033285-90

Defendants' Hearing Ex.	Exhibit Description	Bates No. / Other Designation
	Enterprises LLC, Rising Sun Properties	
	LLC and MineOne Wyoming Data	
	Center LLC, dated April 23, 2024	
25	Loan Agreement between BitGeek DT	MINEONE0033408-13
	Group Limited and MineOne Wyoming	
	Data Center LLC, dated April 30, 2024	
26	Loan Agreement between Intellectual	MINEONE0033414-19
	International Capital and MineOne	
	Wyoming Data Center LLC, dated April	
	30, 2024	
27	Bitmain Invoice Compilation	MINEONE0033210-13
28	Black Hills Energy invoice dated June	MINEONE0033277-80
	11, 2024	
29	Systems MEC Final Invoice dated May	MINEONE0033284
	27, 2024	
30	Systems MEC Disassembly Quote dated	MINEONE0033281-83
	May 22, 2024	

DATED this 19th day of June, 2024.

#### HATHAWAY & KUNZ, LLP

By: /s/ Sean Larson

Sean Larson, Esq. Kari Hartman, Esq. 2515 Warren Ave, Suite 500

Cheyenne, WY 82003

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### LOEB & LOEB LLP

By: /s/ Paula K. Colbath

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## **CERTIFICATE OF SERVICE**

This is to certify that on the 19 <sup>th</sup> day of	of June, 2024, a true and correct copy of the
foregoing was served upon counsel as follow	vs:
Patrick I Murphy	[✓] CM/ECF

Patrick J. Murphy Scott C. Murray Williams, Porter, Day & Neville, P.C. 159 N. Wolcott., Suite 400 P.O. Box 10700 (82602) Casper, WY 82601 Attorneys for Plaintiff	[√] CM/ECF [] Fax: [] E-mail: pmurphy@wpdn.net smurray@wpdn.net
Khale J. Lenhart Tyson R. Woodford Hirst Applegate, LLP P. O. Box 1083 Cheyenne, WY 82003-1083	<ul><li>[✓] CM/ECF</li><li>[ ] Fax:</li><li>[ ] E-mail:</li><li>klenhart@hirstapplegate.com</li><li>twoodford@hirstapplegate.com</li></ul>
Marc Feinstein, pro hac vice William K. Pao, pro hac vice David Iden, pro hac vice Sherin Parikh, pro hac vice Daniel Hirsch, pro hac vice O'Melveny & Myers, LLP Los Angeles, CA 90071 Attorneys for Bitmain Technologies Ge Limited	[✓] CM/ECF [ ] Fax: [ ] E-mail:     mfeinstein@omm.com     wpao@omm.com     diden@omm.com     sparikh@omm.com
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